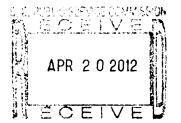
740 Osborn Road ● Barnwell, South Carolina 29812

April 18 2012



Ms. Jocelyn Boyd Chief Clerk and Administrator South Carolina Public Service Commission PO Drawer 11649 Columbia, SC 29211

Dear Ms. Boyd:

Pursuant to Commission Order No. 2011-388, Chem-Nuclear Systems (CNS) is submitting the attached monthly report of variable cost data to the Commission. By copy of this letter we are also submitting this report to the Office of Regulatory Staff (ORS).

The enclosed preliminary monthly report of variable cost data covers the month of March 2012. This report is similar in format to information that has been provided to the ORS in support of the ORS audits of CNS' allowable costs. The monthly data will be summarized on an annual basis to develop variable cost rates that can be used as one predictor of variable costs.

Sincerely,

Michael J. Benjamin

General Manager, Disposal Operations

**Enclosure** 

c: Jay Jashinsky, Office of Regulatory Staff Ashley Lancaster, Budget and Control Board Deborah Ogilvie, Chem-Nuclear Systems, LLC James Harris

## Variable Costs:

## Variable Labor and Non-Labor Costs for March 2012

Commission Order No. 2011-388 identified the following categories of rates for projecting Variable Labor and Non-Labor costs: vault purchase and inspection (per vault), ABC waste disposal (per shipment), slit trench operations (per slit trench offload), customer assistance (per shipment), and trench records (per container).

The following table illustrates the Variable Labor and Non-Labor costs that would be calculated using the Variable Labor and Non-Labor rates identified in Commission Order No. 2011-388 for Fiscal Year 2010-2011 and the number of units in each category:

	Units	Variable Cost Rate in Order No. 2011-388	Calculated Cost
Vault Purchase and Inspection (per vault)	4	\$78.98	\$315.92
ABC Waste Disposal (per shipment) (total shipments, less slit trench shipments, less irregular project shipments)	7	\$1,892.02	\$13,244.14
Slit Trench Operations (per slit trench offload)	0	\$6,830.62	\$0
Customer Assistance (per shipment)	7	\$46.25	\$323.75
Trench Records (per container)	17	\$126.54	\$2,151.18
Total Calculated Variable Labor and Non-Labor Costs			\$16,034.99

The actual Variable Labor and Non-Labor costs experienced during the month of March 2012 resulted in a Total Variable Labor and Non-Labor cost of \$7,210.71.

## Vault Costs for March 2012

The following table illustrates the vault costs that would be calculated using Variable Cost rates identified in Commission Order No. 2011-388 for Fiscal Year 2010-2011 and the volumes of waste received in each respective category:

	Volume Buried (cubic feet)	Variable Cost Rate in Order No. 2011-388	Calculated Cost
Class A Waste	302.54	\$39.81	\$12,044.12
Class B Waste	240.60	\$41.25	\$9,924.15
Class C Waste	4.1	\$42.13	\$172.73
Slit Trench Waste	0	\$188.23	\$0
Irregular Components (in vaults as an irregular cost)	0	n/a	\$0
Irregular Components (not in vaults)	0	n/a	\$0
Total Calculated Vault Cost			\$22,141.60
Total Volume	547.24		

The total cost incurred for disposal vaults procured during March 2012 was \$0.